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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

13 EUFEMIA GUILLEN,)
14 vs. Plaintiff,) Case No.: 3:20-cv-00317-ART-CSD
15)
16 B.J.C.R. L.L.C., a Nevada Limited Liability)
17 Company; B.J.H.S., LLC., a Nevada Limited)
18 Liability Company; R.C.S.J., LLC, a Nevada)
19 Limited Liability Company; Dhilan One L.L.C., a) **ORDER TO EXTEND TIME**
20 Nevada Limited Liability Company; CHAMPAK) **PARTIES TO FILE MOTIONS IN**
21 LAL, an Individual; and BHARAT B. LAL, an) **LIMINE**
22 Individual,)
23 Defendants.) (FIRST REQUEST)
24)
25)
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27)
28)

Pursuant to LR IA 6-1 and LR 26-3, Defendants and Plaintiff Eufemia Guillen (“Plaintiff”), by and through their undersigned counsel, hereby stipulate to extend time for the parties to file their motions in limine in accordance with the court’s Order Regarding Civil Trial (ECF No. 107) from the current deadline of February 28, 2025 through and including March 14, 2025 and to extend the

1 current deadline for responses to motions in limine from March 14, 2025 through and including
2 **March 28, 2025**. This is the first request for an extension of this specific deadline. The requested
3 extension is sought in good faith and not for purposes of undue delay. The reasons for the extension
4 are as follows:

- 5 1. Plaintiff's counsel, JAMES P. KEMP, ESQ., has been out of the country on a long-planned
6 family commitment and will not return until March 7, 2025.
- 7 2. Plaintiff's counsel, BARBARA W. GALLAGHER, ESQ., is also at present out of the
8 country on vacation.
- 9 3. Most importantly, the parties have been in earnest settlement discussions for the past month
10 and have reached the material terms of a resolution of this matter, subject to and conditioned
11 upon agreement to all remaining terms in a final written agreement which is being worked
12 on by the parties.
- 13 4. Unfortunately, with both of Plaintiff's counsel out of the country and unable to meet with
14 and discuss a proposed settlement agreement with Ms. Guillen until they return home,
15 additional time will be needed to reach the final agreement.
- 16 5. With the strong probability of finalizing a settlement of the action in the coming two weeks,
17 it does not make sense to spend time preparing and filing motions in limine, but the parties
18 do not want to allow the deadline to go by without seeking this extension just in case there
19 are any problems with finalizing a settlement agreement.
- 20 6. The parties believe that an additional two weeks will afford time for Plaintiff's counsel to
21 return from their respective travel and meet with Ms. Guillen to complete the settlement
22 agreement resolving the case. Under these circumstances good cause exists to extend the
23 deadlines as set forth herein

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2 Accordingly, additional time is needed and the parties request that the court grant this extension
3 to file motions in limine through and including March 14, 2025 and to extend time to respond to
4 any motions in limine that may be filed until March 28, 2025.

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6 IT IS SO STIPULATED.

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8 Dated this 28th day of February 2025.

9 KEMP & KEMP

10
11 /s/ James P. Kemp
James P. Kemp, Esq.

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13 *Attorney for Plaintiff*

Dated this 28th day of February 2025.

SIMONS HALL JOHNSTON PC

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11 /s/Sandra C. Ketner
Anthony L. Hall, Esq.
Sandra C. Ketner, Esq.

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13 *Attorneys for Defendants*

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16 **ORDER**

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18 IT IS SO ORDERED.

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22 UNITED STATES DISTRICT JUDGE

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24 Dated: 2/28/2025.